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Oak Ridge, TN
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155 Newport Drive
Oak Ridge, TN 37830
January 27, 2001

Mr. Gary Hartman
U.S. Department Of Energy
Oak Ridge Operations, EM-912
P.O. Box 2001
Oak Ridge, TN 37831

Dear Mr. Hartman:

Enclosed are my comments on the Draft Site-Wide Environmental Impact Statement (EIS) for the Oak Ridge Y-12 Plant, dated December 2000.

Recommendation: The proposed new Y-12 vault should be designed to accept all weapons-usable materials except (1) plutonium and (2) weapons-usable materials in spent nuclear fuel as defined by the International Atomic Energy Agency.

The draft EIS proposes construction of a very large super-vault at the Y-12 Plant to store weapons-usable uranium for national security programs. The draft EIS then includes a number of exemptions including weapons-usable ²³⁵U and other materials. The contents of the vault is being defined by the narrow mission of the particular organization within the Department of Energy that will "own" the vault. This is a mistake.

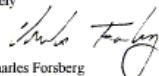
The loss of any weapons-usable material would be a national security threat and a potential disaster. Any comprehensive program of national security would include the highest priority and attention to avoiding potential loss of weapons-usable material. *The potential contents of the vault should be defined on the basis of the national security interests of the entire United States.* As a new vault using the best current technology, this super-vault and the associated security systems will provide better protection against loss of weapons-usable materials than any existing vault. As a new vault, the worker and environmental protection systems will clearly be superior to existing vaults. The operating costs will be far lower.

The new vault should have an open door policy. If one can construct a nuclear weapon from the material (with the exceptions defined above), the vault should have the technical capability and legal authority to accept that material. If U.S. agents in some third world country acquire weapons-usable material, the vault should take it. If there are high costs or other questions about storage of weapons-usable material by anybody in the United States, they should be allowed to use the vault. If some foreign country wants to sell weapons-usable materials to the U.S., the vault should accept it. The national security interests of the U.S. are best served by securely storing this material in the best facility that we own.

The environmental and other impacts of this definition (rather than the narrower programmatic draft EIS definition) on what the proposed facility can store, in terms of the proposed facility, are insignificant. The vast majority of weapons-usable materials are associated with the U.S. nuclear weapons program and would be allowed in this facility based on the draft EIS. The broader definition potentially adds only very-small quantities of materials. The environmental impacts at Y-12 are in the noise level.

The environmental, national security and economic benefits of allowing these other materials into the new super vault are potentially large on the national level. Small vaults for weapons-usable materials are very expensive to operate with high costs to the taxpayers. Small isolated vaults can not be as secure as a large central facility with its massive security forces. Isolated vaults at multiple sites implies training multiple security forces on multiple training ranges with added toxic metals (lead bullets, etc.) to the environment.

Sincerely


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Comment No. 1

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As the commentor notes, the proposed HEU Storage Facility is being designed to meet the requirements for storage of Category I & II HEU associated with the Y-12 National Security Complex Mission. Other weapons-usable nuclear materials and nuclear materials not used in the weapons program (e.g., U-233) are not proposed for storage in the new facility. The types of materials proposed by the commentor are beyond the scope of the proposed action for the HEU Storage Facility. In addition, designing one facility to store the different types of special nuclear materials as suggested would not be practical or cost effective because of the many different types and forms of weapons-usable nuclear materials. Meeting the safety and security requirements associated with combining these different types of materials and their handling and safe storage would not be reasonably feasible.